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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA**

HYEJIN LEE, RUIQI YE and YOLIN
HAN, individually and on behalf of all
other similarly-situated individuals,
Plaintiffs,

v.

SEPHORA USA, INC. and LVMH MOET
HENNESSY LOUIS VUITTON, INC.,
Defendants.

Case No.: 3:14-cv-05237(EMC)

STIPULATION AND PROPOSED ORDER DISMISSING
DEFENDANT LVMH MOET HENNESSY LOUIS VUITTON, INC.

Lee et al. v. Sephora USA, Inc., et al.

Stipulation and Proposed Order
Case No. 3:14-cv-05237-EMC

1 It is hereby stipulated, by and between Plaintiffs Hyejin Lee, Ruiqi Ye and Yolin Han
2 and Defendants Sephora USA, Inc. ("Sephora") and LVMH Moet Hennessy Louis Vuitton, Inc.
3 ("LVMH Inc.):

4 1. The parties agree to the dismissal, without prejudice, of LVMH Inc. as a
5 Defendant in this action.

6 2. If LVMH Inc. is renamed as a party, this Stipulation shall be deemed null and
7 void. If LVMH Inc. is renamed as a party, however, LVMH Inc. retains all rights to bring an
8 appropriate motion to dismiss, motion for summary judgment, and/or motion for sanctions, to the
9 extent it determines such a motion is appropriate.

10 3. Defendants agree that they will not make a motion for or otherwise seek costs,
11 fees, sanctions or any other similar relief related to the naming of LVMH Inc. as a Defendant in
12 the initial Complaint in this action. If LVMH Inc. is renamed as a party in a future pleading,
13 however, LVMH Inc. retains all rights to bring an appropriate motion for sanctions against
14 plaintiffs for renaming it, to the extent it determines such a motion is appropriate.

15 Dated: March 19, 2015
16 San Francisco, CA

17 Respectfully submitted,

18 YUHL CARR LLP

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HYEJIN LEE, RUIQI YE and YOLIN
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v.

SEPHORA USA, INC. and LVMH MOET
HENNESSY LOUIS VUITTON, INC.,
Defendants.

Case No.: 3:14-cv-05237(EMC)

~~[PROPOSED]~~ ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED that Defendant LVMH Moet
Hennessy Louis Vuitton, Inc. is dismissed as a defendant in this action without prejudice.

Date: March ²³ __, 2015

